



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
Community and Family Health  
Post Office Box 47830  
Olympia, Washington 98504-7830

April 10, 2006

Kim Thorburn, MD, MPH  
Chair  
State Board of Health  
Post Office Box 47990  
Olympia, Washington 98504-7990

Dear Dr. Thorburn:

The Department of Health supports the efforts of the State Board of Health to develop criteria to determine immunization requirements for school entry and child care. It is the Department's recommendation that the process for applying the criteria needs to be developed more fully before the Board adopts the criteria. I am asking the Board to delay adoption of the criteria at the April 12, 2006 meeting for the following reasons:

Clarity is needed regarding the Board process for the use of the criteria.

It is unclear what would trigger the application of the criteria to an antigen or vaccine for consideration as a school entry or child care mandate. I appreciate the additional language in the current draft's assumptions section that clarifies that the antigen/vaccine would be part of the universal purchase system and the process section. However, there must be a minimal time for a new vaccine to be part of the universal purchase system so that the additional data expected for the criteria would be available. Information about vaccine availability and promotion through the Immunization Program would seem necessary to adequately apply the criteria. Without a minimum distribution period, the state-specific data necessary to apply the criteria will not be available. Without certainty as to the timing of the application of the criteria and its relationship with the existing approval processes used by state and federal bodies, there is a risk of misalignment with Office of Financial Management's direction that the Department submit funding requests for vaccines in advance of policy changes. We understand that the Board may be considering this within the context of all Board work. It would be good to note in this document.

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More work is needed to test the criteria and clarify how they will be used to support the Board's authority to require immunizations for school and child care center attendees.

In addition, combination vaccines that contain individual antigens already mandated pose a unique challenge. I suggest the application of the criteria to new combination vaccines requires further definition in the document. Since combination vaccines are merely a new delivery method for current antigens, the need or value of applying the criteria is unclear. These vaccines might not need to go through the process.

I appreciate your consideration of these issues and delaying Board adoption of the criteria until they can be addressed. Thank you for your work and leadership on this issue. I look forward to hearing from you.

Sincerely,

A handwritten signature in cursive script that reads "Patty Hayes". The signature is written in black ink and is positioned below the word "Sincerely,".

Patty Hayes  
Assistant Secretary